

ZETLIN & DE CHIARA, LLP

Attorneys for Defendant

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
HARTFORD FIRE INSURANCE COMPANY as
subrogor of Lycee Francais De New York,

07 Civ. 4084 (SHS) (AJP)

Plaintiff,

-against-

MAYRICH CONSTRUCTION CORP., LANGAN
ENGINEERING & ENVIRONMENTAL SERVICES,
INC., F.J. SCIAME CONSTRUCTION CO., INC.,
POLSHEK PARTNERSHIP, LLP & CANTOR
SEINUK GROUP, INC.,

Defendants.
----- X

**DEFENDANT POLSHEK PARTNERSHIP LLP'S
RESPONSE TO MAYRICH CONSTRUCTION CORP. AND F.J. SCIAME
CONSTRUCTION CO., INC.'S NOTICE TO PRODUCE PURSUANT TO RULE 26**

Defendant Polshek Partnership LLP ("Polshek") by its attorneys Zetlin & De Chiara LLP, submits the following as and for its response to Defendants Mayrich Construction Corp. and F.J. Sciamme Construction Co., Inc.'s Notice to Produce Pursuant to Rule 26, dated July 26, 2007:

TO ALL PARTIES:

- A) The names and addresses of all witnesses to the accident whether obtained by investigation or otherwise.
- B) The names and addresses of any and all notice witnesses to the alleged defective condition set forth in the Complaint.

RESPONSE

A-B) Polshek objects to these requests as overly broad, unduly burdensome and not reasonably tailored to lead to the production of admissible evidence. Subject to and without waiving this objection, other than the parties to this litigation, Polshek is not aware of any witnesses to the accident or any notice witnesses to the alleged defective condition.

Polshek reserves the right to amend its disclosures pursuant to the requirements of the FRCP.

Dated: New York, New York
August 23, 2007

ZETLIN & DE CHIARA, LLP

By: 

Bill Chimos (BC-9381)

*Attorneys for Defendant Polshek
Partnership LLP*

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TO: SEE SERVICE LIST